

SUBMISSION No.	060
ISSUES RAISED	
3	
SUMMARY DOCS	

MAIN ISSUES REPORT ADDENDUM **RESPONSE FORM**

As part of the development of the Proposed Local Development Plan a "Main Issues Report" was published in October 2013. This contained 19 questions, the responses to which we are using to inform the content of the new plan. Importantly the 2013 Main Issues Report was based on a draft Scottish Planning Policy document, which was published by Scottish Ministers in April 2013.

The publication of the final Scottish Planning Policy in June 2014 raised a very small number of new issues on which we would welcome your views. Because of this we have chosen to publish an addendum to the Main Issues Report to highlight possible local interpretations of Scottish Planning Policy.

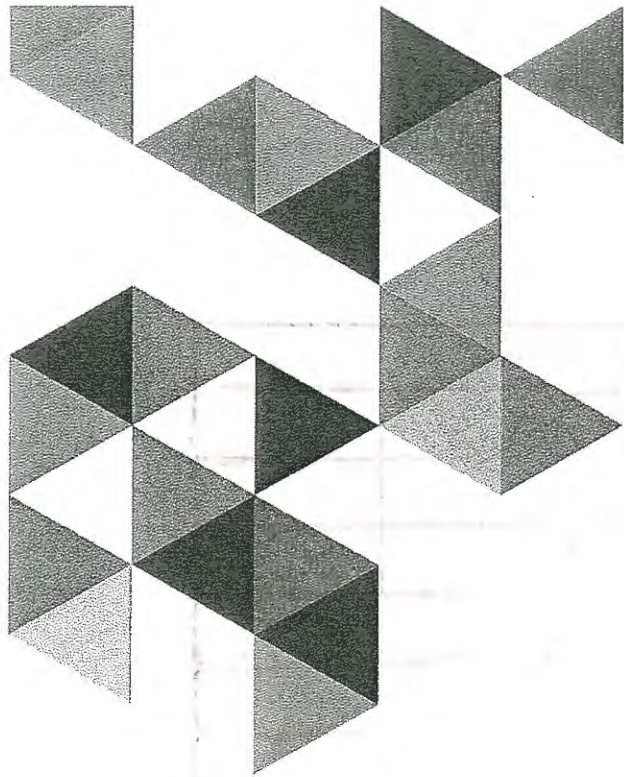
We are not reopening consultation on the range of other issues that were considered as part of the 2013 Main Issues Report, and ask that you only consider the limited number of additional issues set out in the Main Issues Report Addendum in any response you make.

Please note that further comments on any of the other issues that were included in the 2013 Main Issues Report will not be considered at this stage.

All comments received will be carefully assessed and will be used to inform the preparation of the Proposed Aberdeenshire Local Development Plan. There will be a further opportunity to comment on the specific proposals contained in this plan when it is published, in January 2015.

Please email to
ldp@aberdeenshire.gov.uk
or send this form to reach us
by 19th September 2014.





Please use this form to make comments on the Aberdeenshire Local Development Plan Main Issues Report Addendum 2014. If you are making comments about more than one topic it would be very helpful if you could fill in a separate form for each comment.

Please email or send the form to reach us by 19th September 2014 at the following address:

Post: Planning Policy Team
Infrastructure Services
Aberdeenshire Council
Woodhill House
Westburn Road
ABERDEEN
AB16 5GB

Email: ldp@aberdeenshire.gov.uk

YOUR DETAILS

Title _____

First name _____

Surname _____

Date 19 SEPTEMBER 2014

Postal Address _____

Postcode _____

Telephone Number _____

E-mail _____

Are you happy to receive future correspondence only by email - Yes No

Are you responding on behalf of another person? Yes No

If yes who are you representing HOUSES FOR SCOTLAND

An acknowledgement will be sent to this address soon after the close of consultation.



Aberdeenshire Local Development Plan Main Issues Report Addendum

Question 3 Land Supply and Distribution

Homes for Scotland agrees with some of the context set out in this section of the Addendum:

- The Strategic Development Plan is now approved and its housing requirements are agreed as the basis for planning
- The 2014 Housing Audit is now finalised and published with very limited areas of dispute between the Council and the industry. For the purposes of this response, the published audit will be used as the basis for analysis
- The Council is correct in paragraph 4.6 of the Addendum to highlight the change in Scottish Planning Policy now requiring that plans allocate sites that are “effective or expected to become effective in the plan period”. That is a stronger test than the previous wording, and requires that planning authorities clearly evidence the deliverability of sites rather than simply allocate them

In that context, it is entirely unclear why Table 3 reverts to the previous Structure Plan and its housing requirements. The argument is that it was the strategic plan in force at the time of the 2014 Audit, but this is a technicality when the proposed SDP had been in the public domain for some time and it was known that Reporters had not recommended any changes to the housing requirements. Homes for Scotland’s analysis is therefore based on the SDP housing requirements.

The Council's argument is that it has enough land to deliver the SDP requirement; that it has a 5-year effective supply now, and that it has sufficient long-term land (including constrained land) that it is confident can be delivered.

The evidence for this is not presented in the Addendum. The Addendum does not actually set out the overall requirement for the SDP period. Table 1 of Homes for Scotland’s supporting analysis shows that the SDP has a total requirement 2011 to 2035 of almost 54000 houses. The Addendum Table 2 shows an established supply of c.50000, and completions 2011 – 2013 were approximately 5400. The established supply is therefore only just in line with the SDP requirement with little additional generosity. Given the known uncertainties around constrained sites becoming effective – the Turley Associates research in 2006 showed that up to 30% of

constrained sites never come forward for development – then the Council's confidence that there is already sufficient land identified to deliver the SDP requirement is misplaced.

The Council's position in the longer-term is based on the assumption that the constrained sites can be made effective, and it points to its Action Programme as evidence that this can be delivered. Although the Action Programme has been updated, it certainly does not show satisfactory progress on 'the vast majority of the existing development allocations'. There are still many allocated sites where no developer is involved, and where the critical detailed servicing information required to give the greater certainty of delivery (which SPP now requires) has not been provided. The Housing Audit process does not test constrained sites in any way – they are simply noted as constrained or post 7 years with no further consideration of the effectiveness criteria.

For the Council to be confident that it can deliver the SDP requirements over the longer-term then it has to undertake testing of constrained sites in conjunction with the housing industry in order to create a credible evidence base for the LDP.

3 Homes for Scotland's supporting analysis sets out the SDP requirements and land supply to allow the whole period of the new LDP to be considered. Table 2 sets out the SDP requirement by Housing Market Area, shows the 5-year requirement at each year, sets out the programming from the 2014 Audit, and compares the 5-year supply and requirement for each year.

It should be noted that the programming beyond 2021 is derived as shown in Table 3. For Aberdeen City, programmes for sites which start before 2021 are continued onwards. Sites post-2021 are not programmed but are listed and show that there are c. 3100 further potential sites where further testing is required. For the Shire, the Audit Appendix 3 shows programming extended to 2025 and this is used in the analysis. Again, sites constrained post-2025 are not added, partly as they need to be fully tested, partly as they do not fall into the 10 year LDP period unless significant changes occur in their status.

Table 2 then shows the number of years effective supply which will result from the Audit supply and the SDP requirement for each year to 2026. In order to account for the generosity requirement of SPP a minimum 5.5 year supply is required to provide 10% generosity, a 6-year supply to provide 20% generosity. Years where the supply equals or exceeds 6 years are shown in black; where there is between 10 and 20% generosity, years are shown blue; where the supply is less than 5 years or where generosity is less than 10% years are shown red.

The analysis shows an immediate and continuing contrast between the AHMA, which sustains a generous supply to 2020, and the RHMA which never achieves a 5-year effective supply. Combining the two into the whole SDP area, there is a generous supply to 2019, when the amount of supply falls away very sharply. This

means that both Councils will be heavily-reliant on constrained sites coming forward into the effective supply very quickly in order that they start producing substantial completions in the next few years.

Given the uncertainties over removal of constraints, the lengthy timescales for processing major planning applications in both Councils, and the many inter-Service issues around negotiating developer obligations and S 75 Agreements, Homes for Scotland does not believe that the existing established supply can bridge these gaps either in quantum or timescale.

Table 4 considers the SDP strategy of seeking 50% delivery of housing in the city, 50% in the Shire. This Table suggests that the City can sustain a generous supply to 2019/2020, but that the Shire quickly falls short after 2018. The situation in the City is probably boosted by the delays in implementing the larger allocations from the last Local Plan. In the Shire, the analysis shows starkly the extent to which delivery of the overall strategy is dependant on constrained sites coming forward quickly. Without evidence and testing, the industry again remains unconvinced.

There is a strong case from this analysis that additional land allocations are needed in the LDP. These should be in marketable parts of Aberdeenshire within the AHMA, not the RHMA. Although there is a 5-year supply issue evident in the RHMA, the reality of market demand is that extensive new allocations in the RHMA will not result in the delivery required. To deliver the housing requirement of the SDP will require new allocations in the AHMA part of the Shire.

Additional allocations will enhance marketability and deliverability, provide greater range and choice, and ensure a generous supply, all in line with the requirements of Scottish Planning Policy. Allocations should be made across a range of sizes of site, again to increase range and choice. It is important to recognise that increased housing delivery is more likely to happen where builders and customers have a wider range of outlets operating across a range of locations and market segments.

HOMES FOR SCOTLAND - ABERDEENSHIRE LDP MIR ADDENDUM HOUSING ANALYSIS

Table 1 SDP Requirements and Audit Supply

	2011 - 16	17 - 26	27 - 35	TOTAL
AHMA				
Requirement	9965	15017	13506	38488
Audit completions/programme	10198	18228	1280	
Variance	233	3211	-12226	
Variance %	2%	21%	-91%	
RHMA				
Requirement	4237	6411	4836	15484
Audit completions/programme	3213	4519	914	
Variance	-1024	-1892	-3922	
Variance %	-24%	-30%	-81%	
SDP				
Requirement	14202	21428	18342	53972
Audit completions/programme	13411	24500	2194	
Variance	-791	3072	-16148	
Variance %	-6%	14%	-88%	

Note: 2022 -2026 based on extending pre-21 programmes. No unprogrammed sites included

Table 2 Aberdeen and Shire Housing Requirements and Supply - Approved SDP and agreed 2014 Audit

	2014	2015	2016	2017	2018	2019	2020	2021	2022	2023	2024	2025	2026	2027	2028	2029	2030	2031	2032+	2022+	27 - 35
Aberdeen HMA																					
Programme	1478	2479	2309	2536	2395	2494	2396	2126	1673	1489	1312	1155	652	385	235	235	160	50	215	7561	1280
SDP Annual	1660	1660	1660	1502	1502	1502	1502	1502	1502	1502	1502	1502	1502	1500	1500	1500	1500	1500			
SDP 5-Year Requirement	7984	7826	7668	7510	7510	7510	7510	7510	7510	7508	7506	7504	7502								
5 Year supply	11197	12213	12130	11947	11084	10178	8996	7755	6281	4993	3739	2662	1667								
Years supply	6.7	7.4	7.3	8.0	7.4	6.8	6.0	5.2	4.2	3.3	2.5	1.8	1.1								
Rural HMA																					
Programme	441	636	668	670	646	538	505	455	421	361	341	301	281	226	181	161	117	44	185	2619	914
SDP Annual	847	847	847	712	712	712	712	712	712	712	712	712	712	537	537	537	537	537			
SDP 5-Year Requirement	3965	3830	3695	3560	3560	3560	3560	3560	3560	3385	3210	3035	2860								
5 Year supply	3061	3158	3027	2814	2565	2280	2083	1879	1705	1510	1330	1150	966								
Years Supply	3.6	3.7	3.6	4.0	3.6	3.2	2.9	2.6	2.4	2.1	1.9	1.6	1.4								
Total SDP Area																					
Programme	1919	3115	2977	3206	3041	3032	2901	2581	2094	1850	1653	1456	933	611	416	396	277	94	400	10180	2194
SDP Annual	2507	2507	2507	2214	2214	2214	2214	2214	2214	2214	2214	2214	2214	2037	2037	2037	2037	2037			
SDP 5-Year Requirement	11949	11656	11363	11070	11070	11070	11070	11070	11070	10893	10716	10539	10362								
5 Year supply	14258	15371	15157	14761	13649	12458	11079	9634	7986	6503	5069	3812	2633								
Years Supply	5.7	6.1	6.0	6.7	6.2	5.6	5.0	4.4	3.6	2.9	2.3	1.7	1.2								

Table 3 Aberdeen HMA - Programmed and Unprogrammed Sites

Note: Aberdeen sites assume continuation of effective programmes

	2022	2023	2024	2025	2026	2027	2028	2029	2030	2031	2032+
Formartine Area	143	125	125	177	50	50	50	50	50	50	215
Garioch Area	332	212	100	133	117						
Kincardine Mearns	15	30	30	30	0						
Marr	0	0	0	0	0						
Shire sum	490	367	255	340	167	50	50	50	50	50	215
City Sites											
Broadford Works	100	77									
OP29 Craibstone South A	50	50	50	50	50	50	50	50			
OP 30 Rowett South	135	135	135	135	135	135	135	135	110		
OP 43 44 Maidencraig	75	75	75	75	25						
OP22 Davidsons Papermill	100	100	112								
Wellington Road Cove Bay	38										
OP77 Lorrston	185	185	185	55							
OP 12 Grandhome	200	200	200	200							
OP 58 Countesswells	250	250	250	250	250	150					
OP 62 Oldford	50	50	50	50	25						
City Total	1183	1122	1057	815	485	335	185	185	110	0	0
Total Programmed	1673	1489	1312	1155	652	385	235	235	160	50	215
Unprogrammed Sites											
Kepplestone											9
41 Nelson St											30
1 Western Rd											22
Greenferns											120
Powis Lane											6
1 & 2 Springbank Tce											7
Bimini 69 Constitution St											6
Pittodrie											350
26 - 38 Union ST											19
Ex Dutch School Boyd Orr Dr											18
29 St Clement ST											5
OP 45 Greenferns											950
Greyhope Rd Bon Accord Works											69
OP 29 Craibstone S B											300
OP 31 Greenferns Landward											1000
OP 7 Balgownie Centre											171
279 - 81 N Deeside Rd											16
OP 34 Peterculter Burn											19
											3117

Table 4 SDP Requirement by City/Shire - assumes 50/50 split of requirement

	2014	2015	2016	2017	2018	2019	2020	2021	2022	2023	2024	2025	2026	2027	2028	2029	2030	2031	2032+
Aberdeen City																			
Programme	775	1484	1338	1403	1287	1532	1440	1242	1183	1122	1057	815	485	335	185	185	110	0	2032+
SDP Annual	1250	1250	1250	1105	1105	1105	1105	1105	1105	1105	1105	1105	1105	1018	1018	1018	1018	1018	
SDP 5-Year Requirement	5960	5815	5670	5525	5525	5525	5525	5525	5525	5438	5351	5264	5177						
5 Year supply	6287	7044	7000	6904	6684	6519	6044	5419	4662	3814	2877	2005	1300						
Years supply	5.0	5.6	5.6	6.2	6.0	5.9	5.5	4.9	4.2	3.5	2.6	1.8	1.2						
Aberdeenshire																			
Programme	1144	1631	1639	1803	1754	1509	1461	1339	490	367	255	340	167	50	50	50	50	50	2032+
SDP Annual	1250	1250	1250	1105	1105	1105	1105	1105	1105	1105	1105	1105	1105	1018	1018	1018	1018	1018	
SDP 5-Year Requirement	5960	5815	5670	5525	5525	5525	5525	5525	5525	5438	5351	5264	5177						
5 Year supply	7971	8336	8166	7866	6553	5166	3912	2791	1619	1179	862	657	367						
Years supply	6.4	6.7	6.5	7.1	5.9	4.7	3.5	2.5	1.5	1.1	0.8	0.6	0.3						

Note : Years supply

Black = more than 20% generosity
 Blue = more than 10% generosity
 Red = less than 10% generosity or less than 5 years